

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re PARMALAT SECURITIES
LITIGATION,

This document relates to: 07 Civ. 03790

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY, and JOHN
HANCOCK INSURANCE COMPANY OF
VERMONT,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION,
BANK OF AMERICA, N.A., and BANC OF
AMERICA SECURITIES LLC,

Defendants.

MASTER DOCKET

04 MD 1653 (LAK)

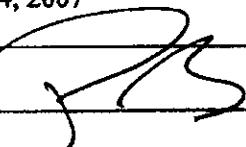
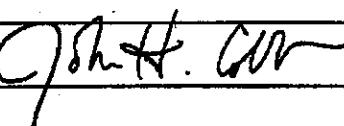
**JOINT STIPULATION AS TO
FACT DISCOVERY PERIOD**

This Joint Stipulation applies only to the above-captioned action, which was consolidated in the *In Re Parmalat* MDL proceeding on May 17, 2007.

1. The purpose of this Stipulation is to establish a reasonable time period within which the parties may conduct fact discovery.
2. The parties request the Court's approval of a seventy-five (75) day fact discovery period commencing June 15, 2007. Within such time period, the parties shall exchange discovery requests and conduct all fact-witness depositions pursuant to the Federal Rules of Civil Procedure. This agreement does not restrict the parties from objecting to specific discovery requests.

3. Prior to the completion of the proposed 75-day fact discovery period, the parties shall consult with one another and make application to the Court, jointly or separately, to set reasonable deadlines for the exchange of expert reports, the completion of expert discovery, and the filing of dispositive motions, if any.

May 24, 2007

By 	By 
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Lewis A. Kaplan
United States District Court Judge